IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	**BANKRUPTCY CASE NO.**
ROGER CHARLES WILLETTE and	§	**13-32377-H5-11**
KIMBERLEY TEW WILLETTE,	§	
DEBTORS	§	**Chapter 11**

DEBTORS' EMERGENCY MOTION TO REOPEN CASE

IF YOU WANT A HEARING, YOU MUST REQUEST ONE IN WRITING, AND YOU MUST RESPOND SPECIFICALLY TO EACH PARAGRAPH OF THIS PLEADING. YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY ONE DAYS FROM THE DATE YOU WERE SERVED AND GIVE A COPY TO THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF.

IF A PARTY REQUESTS EMERGENCY CONSIDERATION, THE COURT MAY ACT EXPEDITIOUSLY ON THE MATTER. IF THE COURT ALLOWS A SHORTER RESPONSE TIME THAN TWENTY ONE DAYS, YOU MUST RESPOND WITHIN THAT TIME. IF THE COURT SETS AN EMERGENCY HEARING BEFORE THE RESPONSE TIME WILL EXPIRE, ONLY ATTENDANCE AT THE HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS. IF AN EMERGENCY HEARING IS NOT SET, YOU MUST RESPOND BEFORE THE RESPONSE TIME EXPIRES.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

COME NOW ROGER CHARLES WILLETTE and KIMBERLEY TEW WILLETTE, Debtors herein, and file this Emergency Motion to Reopen Case, and in support thereof respectfully state as follows:

1. Debtors case was closed on December 29, 2014 without entry of a discharge.

2. Debtors wish to reopen the bankruptcy case to allow them to file an emergency motion to convert their Chapter 11 bankruptcy proceeding to one under Chapter 7 of the United States Bankruptcy Code.

WHEREFORE, premises considered, Debtors, ROGER CHARLES WILLETTE and KIMBERLEY TEW WILLETTE, respectfully request that this Emergency Motion to Reopen Case be granted to allow them to file an emergency motion to convert their Chapter 11 bankruptcy proceeding to one under Chapter 7 of the United States Bankruptcy Code.

Respectfully submitted,

/s/ Margaret M. McClure

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ATTORNEY FOR THE DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed electronically or mailed by first class mail, postage prepaid, or faxed this 16th day of June, 2017 to the parties on the attached matrix.

/s/ Margaret M. McClure
MARGARET M. MCCLURE

13-32377 Roger Charles Willette and Kimberley Tew Willette
Case type: bk **Chapter:** 11 **Asset:** Yes **Vol:** v **Judge:** Karen K. Brown
Date filed: 04/23/2013 **Date of last filing:** 06/06/2017 **Plan confirmed:** 09/24/2014
Date terminated: 12/29/2014

Attorneys

Bruce Michael Badger Badger Law Office 3400 Ave H 2nd Floor Rosenberg, TX 77471 281-633-9900 281-633-9916 (fax) bkcy@badgerlawoffice.com *Assigned: 07/16/2013*	representing	**Blueprint Acquisitions, LLC** Blueprint Acquisitions, LLC *(Creditor)*
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Morton R Branzburg Klehr Harrison Harvey Branzburg LLP	representing	**ASD Specialty Healthcare, Inc. dba Besse Medical** *(Creditor)*

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LEAD ATTORNEY

Attorney		Party
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		Roger Charles Willette 3019 Dolphin Court Seabrook, TX 77586 *(Debtor)*
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PACER Service Center			
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PACER Login:	mm0211:2599286:0	**Client Code:**	
Description:	Attorney List	**Search Criteria:**	13-32377
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Label Matrix for local noticing
0541-4
Case 13-32377
Southern District of Texas
Houston
Fri Jun 16 13:02:49 CDT 2017

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Internal Revenue Service
Special Procedures Branch
Insolvency Section II (7,11)
1919 Smith Street, Stop 5025HOU
Houston, TX 77002

(d)Internal Revenue Service
c/o United States Attorney General
U.S. Department of Justice
10th & Constitution, N.W.
Washington, D.C. 20530

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)ASD Specialty Healthcare, Inc. dba Besse M

(u)Blueprint Acquisitions, LLC
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Total	77